

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Service Rules for the 698-746, 747-762)	WT Docket No. 06-150
and 777-792 MHz Bands)	
)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	
)	
Section 68.4(a) of the Commission's Rules)	WT Docket No. 01-309
Governing Hearing Aid-Compatible)	
Telephones)	
)	WT Docket No. 03-264
Biennial Regulatory Review – Amendment of)	
Parts 1, 22, 24, 27, and 90 to Streamline and)	
Harmonize Various Rules Affecting Wireless)	
Radio Services)	
)	WT Docket No. 06-169
Former Nextel Communications, Inc.)	
Upper 700 MHz Guard Band)	
Licenses and Revisions to Part 27 of)	
the Commission's Rules)	
)	PS Docket No. 06-229
Implementing a Nationwide,)	
Broadband, Interoperable Public)	
Safety Network in the 700 MHz)	
Band)	WT Docket No. 96-86
)	
Development of Operational, Technical and)	
Spectrum Requirements for Meeting Federal,)	
State and Local Public Safety		
Communications Requirements Through the		
Year 2010		

COMMENTS OF

The Idaho Statewide Interoperability Executive Council (SIEC)

The Idaho SIEC hereby submits these reply comments in response to the Commission's

Further Notice of Proposed Rulemaking in the above-captioned proceedings.

The Idaho Statewide Interoperability Executive Council (SIEC) is deeply alarmed by a number of key provisions present in the FCC Report and Order and Further Notice of Proposed Rulemaking, FCC 07-72 released on April 27th, 2007. Our review of this Rulemaking leads us to believe that the recent FNPRM will not deliver on its intended goals as regards public safety communications. Indeed, the provisions of FCC 07-72 related to public safety spectrum assignment will create an environment considerably less conducive to the special requirements of the region rather than enhancing the communication options of the region.

Specifically, the Idaho SIEC submits that the current band plan for 700MHz wireless data operation should remain under the control of the public safety communications experts at the RPC level, and if the existing approved Region 12 Plan is changed at all, it should be modified to the extent of adding a local option permitting broadband operation. Based on our observations of public safety radio system user requirements, we are concerned that the proposed elimination of wideband wireless data capabilities would create enormous design challenges for system planners in our region.

The Idaho SIEC is concerned about the impact of band reconfiguration on systems that are already purchased, and in some cases, awaiting installation. Consideration of any restructuring strategy that does not provide a funding mechanism for these systems, without providing due compensation for reconfiguration to incumbent agencies or agencies that are involved in system development, will create significant costs for local governments in the State of Idaho. As proposed in the FNPRM, the loss of spectrum available to public safety is an untenable situation and is strongly discouraged by the Idaho SIEC.

Respectfully submitted,



Name: Chief R. Mark Lockwood, Chair

Idaho Statewide Interoperability Executive Council (SIEC) www.siec.id.gov

Date; May 22, 2007